

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorns Street

75 Hawthorne Street San Francisco, CA 94105-3901

ContextLogic, Inc.
1 Sansome Street, FL 40

San Francisco, CA 94104

ATTENTION: Piotr Szulczewski, CEO

Sent via email:

Mr. Danny Zhang

Co-Founder and Chief Technology Officer

ContextLogic Inc.

1 Sansome St Fl 40

San Francisco, California, 94104-4448

**United States** 

CC to:

Sean Hanley, Senior Counsel, Wish

Joseph J. Green, Kelley Drye & Warren LLP

## Re: ContextLogic Inc d/b/a Wish.com - Request for Information Under § 208(a) of the Clean Air Act, 42 U.S.C. § 7542(a)

Dear Mr. Szulcewski and Mr. Zhang:

The United States Environmental Protection Agency ("EPA") hereby requires ContextLogic, Inc., and any of its parent organizations, affiliates, predecessors, successors, and assignees ("ContextLogic" or "you"), to submit certain information as part of an EPA investigation to determine ContextLogic's compliance with Section 203 of the Clean Air Act ("CAA"), 42 U.S.C. § 7522, 1 and the applicable regulations at 40 C.F.R. Parts 85, 86, and 1068. Examples of vehicles regulated under these Parts include, but are not limited to, diesel trucks, light-duty gasoline vehicles, highway motorcycles. Appendix A provides definitions. Appendix B provides instructions for your responses to this request for information. Appendix C specifies the information that you must submit. Appendix D provides information about asserting a claim of confidentiality over information you submit in response to this request for information. Appendix E contains language certifying the truth and completeness of your response. Appendix F provides samples from the Wish marketplace platform of product screenshots captured by the EPA. Appendix G provides an example excel spreadsheet.

The EPA issues this Request for Information ("Information Request") under Sections 114(a) and 208(a) of the CAA, 42 U.S.C. §§ 7414(a) and 7542(a). Under Section 114(a), the Administrator of the EPA may require any person to establish and maintain such records, make such reports, and provide such

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<sup>&</sup>lt;sup>1</sup> The CAA makes it a violation "for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use." CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B). It is also a violation to cause any of the foregoing acts. CAA § 203(a), 42 U.S.C. § 7522(a).

other information as the Administrator may reasonably require when the Administrator believes the person may have information necessary for the purposes of carrying out any provision of the CAA, except the provisions of the CAA with respect to a manufacturer of new motor vehicles or new motor vehicle engines. Under Section 208(a), the Administrator of the EPA may require any person who is subject to the CAA to provide information necessary to determine whether the person has acted in compliance with these requirements and the regulations promulgated thereunder. The Administrator has delegated this authority to the undersigned Manager of Region 9's Air Enforcement Office, Enforcement and Compliance Assurance Division.

You must submit responses to this Information Request to the EPA representative listed below within thirty (30) calendar days from the date you receive this Information Request. Please carefully review the instructions, definitions, and specific requests as you prepare your response. If you anticipate being unable to fully respond to the Information Request by this date, you must contact Nathan Dancher at (415) 972-3482 or <a href="mailto:dancher.nathan@epa.gov">dancher.nathan@epa.gov</a> to request an extension. Any such request should be made in writing as soon as possible after receipt of this Information Request and must explain why an extension is necessary and include a proposed timeline for providing the requested information. If timely submitted, the EPA will review your request and may extend the time in which your response must be provided. The EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely assess and confirm your company's compliance with the CAA.

Failure to provide the requested information may result in the initiation of a civil action pursuant to Section 205(b) of the CAA, 42 U.S.C. § 7524(b). Failure to provide all requested information in its entirety, and in the format requested, may result in additional inquiries and penalties. These inquiries may include additional written requests, inspections, or depositions as authorized by Sections 208 and 307 of the CAA, 42 U.S.C. §§ 7542(a)–(b), 7607(a). It is important that your responses be clear, accurate, organized, and complete. The EPA will regard any submitted information that is misleading, false, incomplete, or submitted without regard to its accuracy as a violation of the CAA and/or criminal statutes. We may use any information submitted in response to this Information Request in an administrative, civil, or criminal action.

You must submit all requested information under an authorized signature with the following certification provided in Appendix E.

You may be entitled to assert a business confidentiality claim covering all or part of the information provided in response to this Information Request as specified in the Confidentiality of Business Information ("CBI") regulations, 40 C.F.R. Part 2, Subpart B. However, no CBI claim may be made with respect to emissions data as defined at 40 C.F.R. § 2.301(a)(2). You must specify the page, paragraph, and sentence when identifying the information subject to your CBI claim. Appendix E of this Information Request specifies the assertion and substantiation requirements for business confidentiality claims. EPA may, without further notice, provide the public with any information not subject to a CBI claim.

Please submit the requested information electronically. You may do so via email to Nathan Dancher, Region 9 Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, at dancher.nathan@epa.gov. Please note that the EPA email server will allow attachments up to 20 MB.

Alternatively, you may want to provide documents in response to this Request for Information by way of a secure file sharing site. Please let us know how you want to proceed.

Any questions concerning this Information Request should be directed to Nathan Dancher at (415) 972-3482 or <a href="mailto:dancher.nathan@epa.gov">dancher.nathan@epa.gov</a> or have your attorney contact Margaret Alkon in the Office of Regional Counsel at (415) 972-3890 or <a href="mailto:Alkon.Margaret@epa.gov">Alkon.Margaret@epa.gov</a>.

Sincerely,

Roshni Brahmbhatt, Manager Air Enforcement Office Enforcement and Compliance Assurance Division EPA Region 9 – San Francisco

Enclosures

#### Appendix A

#### **Definitions**

All terms used in this Information Request will have their ordinary meaning unless such terms are defined below or in the CAA, 42 U.S.C. §§ 7401 et seq., or the Motor Vehicle Regulations found at 40 C.F.R. Parts 85, 86, and 1068, in which case they shall have their meanings as defined therein.

- 1. The term "information" includes any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intraoffice communications, electronic mail ("email"), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting, or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, presentations, spreadsheets, and worksheets. The term "information" includes all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to the foregoing, as well as any attachments or appendices thereto. The term "information" also includes any graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, voicemails, microfiche, microfilm, videotapes, recordings, and motion pictures), electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, back-up tape, memory sticks, recordings, and removable computer media such as thumb drives, flash drives, memory cards, and external hard drives), and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, electronic format, disk, videotape or otherwise. Information bearing any notation not part of the original text is considered to be separate information. A draft or non-identical copy is separate information within the meaning of this term.
- 2. The term "entity" means any natural person, corporation, partnership, limited liability company, sole proprietorship, joint venture, or any formal or informal group, organization or association.
- 3. The term "person" includes an individual, corporation, partnership, or association. *See* Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
- 4. The term "you," 'your," and "ContextLogic" means ContextLogic Inc, and any affiliates, predecessors, successors, and assignees.
- 5. The term "affiliated organization" means any organization or entity associated with another entity as an agent, parent organization, predecessor corporation, subsidiary organization, or any organization, or entity acting in lieu of another entity.
- 6. The term "applications" means all vehicle or engine configurations.

- 7. The term "emission related parts" means those parts installed for the specific purpose of controlling emissions, or those components, systems, or elements of design which must function properly to assure continued vehicle emission compliance, as defined in 40 C.F.R. § 85.2102. Emission related parts include, but are not limited to, catalysts, exhaust gas recirculation systems, diesel particulate filters, and selective catalytic reduction systems.
- 8. The term "element of design" means any control system (e.g., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine, as defined in 40 C.F.R. §§ 86.094-2 and 86.1803-01.
- 9. The term "product" includes any software code, software, hardware, program, element of design, calibration, engine tune, EM product, device, part, or component.
- 10. The term "exhaust product" means exhaust components designed for use downstream from the exhaust port of a motor vehicle engine, and include, but are not limited to, exhaust gas recirculation ("EGR") block plates, EGR delete kits, exhaust replacement pipes, and straight pipes. This term does not include ancillary exhaust components such as clamps, hangers, nuts, bolts, and gaskets that are not capable of impacting or replacing emission related parts.

#### Appendix B

#### **Instructions for Responses**

- 1. Provide a complete, detailed response, in English, to each Request in Appendix C below.
- 2. Where this information request asks for information about products that ContextLogic offered to sell or sold, include in your response products that were sold by merchants, suppliers, or third party sellers using ContextLogic online marketplaces.
- 3. Appendix G consists of an Excel workbook in which you are requested to organize your responses to Requests 1 through 2. Please populate the workbook with your responses to Requests 1 through 2 in accordance with all instructions. Requests 1 through 2 are summarized in Appendix G for your convenience only. The Request summaries in Appendix G are not substitutes for the full text of the Requests in Appendix C. Please contact Nathan Dancher if providing the responses in Excel format will be an issue.
- 4. Please provide your response to this Information Request in electronic form. All responsive documents and materials (e.g., copies of print media, audio, and visual material) must be provided as an accurate and legible copy in searchable unlocked format, number stamped in sequential order (e.g., BATES stamped). Where spreadsheets are responsive to a Request, produce them in unlocked electronic .xlxs spreadsheet format (locked files are unacceptable).
- 5. Where a Request allows or requires documents to be provided in response, provide all documents electronically in a folder specific to that question or subpart and labeled accordingly. Provide copies of documents, not original documents.
- 6. When a response is provided in the form of a number, specify the units of measure.
- 7. Where documents or information necessary for a response is not in your possession, custody, or control, indicate in your response why such documents or information are not available or in your possession, custody, or control, and identify any source that either possesses or is likely to possess such information.
- 8. Where you have previously submitted information to the EPA that is responsive to any of the Requests set forth in Appendix C, re-submit that information in accordance with these instructions (Appendix B). Identify the material that was previously provided, the date on which it was provided, how the information was provided (e.g., electronically, fax, mail), and the individual at the EPA to whom it was provided.
- 9. If you assert any objections in responding to this Information Request, each objection must state with specificity the grounds for objecting to the request, including the reasons, and must state whether any responsive materials are being withheld on the basis of that objection.
- 10. This Request for Information is a continuing request. You must promptly supplement your response to any Request in Appendix C in the event you learn that you possess responsive information not yet produced or if you gain possession, custody, or control of responsive information after responding to this Information Request.

#### **Appendix C**

#### **Information Request**

ContextLogic Inc ("ContextLogic" or "you") must submit the following information to the United States Environmental Protection Agency pursuant to Section 208 of the CAA, 42 U.S.C. § 7542, regarding the sale or offer for sale of certain parts and products.

#### Provide the following information in an electronic, unlocked spreadsheet:

- 1. Identify each exhaust product offered for sale on Wish or another ContextLogic online marketplace in a manner available for purchase by customers in the United States during the period from January 1st, 2019, through the date of this Information Request, in Appendix G, worksheet 1, and provide the requested information. ContextLogic may provide the requested information in a different format (e.g., in a spreadsheet routinely maintained by ContextLogic) if all the information requested in items a-g below is included.
  - a. Part Number, Item Code, or other unique identifier used by ContextLogic;
  - b. ContextLogic URLs for this product from this merchant;
  - c. Merchant or third party seller, if any. In identifying the merchant, provide:
    (i) the merchant name and contact information available to purchasers on the ContextLogic online marketplaces, and
    - (ii) separately provide (a) merchant full legal name, (b) address(es), (c) contact information, and (d) agent for service of process in the United States, if any;
  - d. Product name;
  - e. Product manufacturer;
  - f. Identify the product's applications by vehicle type, make, model, and year(s);
  - g. Time period, including starting and ending dates since January 1, 2019, when this Product was offered for sale on Wish or another ContextLogic online marketplace in a manner available for purchase by customers in the United States;
  - h. Quantity of all distributions or shipments of the Product to United States customers purchasing the Product via a ContextLogic online marketplace during the period January 1<sup>st</sup>, 2019, through the date of this Information Request;
  - i. Average sale price;
  - j. Indicate whether, together with the addition, modification, or removal of a motor vehicle's parts, the product has the effect to permanently or temporarily change, affect, bypass, defeat, or render inoperative a motor vehicle emission control device or emission related part;
  - k. Identify whether or not this Product offered for sale by this merchant is part of the Fulfillment by Wish system. If yes, please note the quantity;
  - 1. Identify whether or not this Product from this merchant when offered for sale in a manner available for purchase by customers in the United States is delivered or shipped or is otherwise part of the Wish Post system. If yes, please note the quantity; and
  - m. Total fees collected by ContextLogic for services for this Product provided by ContextLogic, including all listings, promotions, sales, and/or advertisement of the Product on a ContextLogic online marketplace (in US dollars).
- 2. For each product identified in response to Request 1 which was offered for sale on Wish or another ContextLogic online marketplace during the period January 1<sup>st</sup>, 2019, through the date of

this Information Request, provide all sales information using the format provided in Appendix G, worksheet 2. ContextLogic may provide the requested information in a spreadsheet exported from an invoice management program such as QuickBooks in lieu of using Appendix G, worksheet 2.

#### **Provide the following information.**

- 3. Provide a narrative description of the method used by ContextLogic to identify products in response to Request 1. In addition to methods identified by ContextLogic as likely to identify products within the scope of Request 1, use the following terms independently to search all product listings in the specified timeframe. The search shall not be case specific. Also include all products that would be identified to a customer when using the keyword search term on the ContextLogic online marketplace search engine at any time between January 1, 2019 to the date of this request:
  - a. EGR delete
  - b. Turbo back exhaust
  - c. Downpipe back exhaust
  - d. SCR delete
  - e. DEF delete
  - f. DPF delete
  - g. Cat delete
  - h. Delete tune
  - i. Delete tuner
  - j. Delete programmer
- 4. For each product identified in response to Request 1:
  - a. provide a copy of any product listing page(s) that were available for viewing on a ContextLogic online marketplace between January 1, 2019, to the date of this request. The webpage shall be in an **unlocked searchable** .pdf file named by the product identifier. Include each webpage associated with the subject product (e.g., landing page, all customer review pages, all customer Q&A pages, etc.). If substantially different webpage advertisement variations of a subject product existed over the course of the product sales reported in Request 1, provide copies of each unique webpage titling each file by its date of original posting (i.e.YYYY-MM-DD) and within a folder named by the product identifier. Substantially different webpages are those where the name of the product, or product description has changed; and
  - b. provide all manuals (e.g., owner's and installation) in your possession.
  - c. provide the percentage or set amount of the list price collected by ContextLogic
  - d. describe the services or product features related to the sales of this product through or in connection with CLI's services which contributed to the fee collected by ContextLogic for each product sale completed through ContextLogic 's online marketplaces.
- 5. Provide a detailed, written description of ContextLogic's business structure including ownership, corporate form, parent and/or subsidiary companies, and affiliated organizations.
- 6. Provide a copy of the current Merchant Operation Guide and other documents that apply to merchant sellers importing to and/or selling product in the United States with the assistance of ContextLogic and/or via the Wish platform.

- 7. Provide the location of all warehouses or storage facilities where ContextLogic stores products or encourages its third party venders to store products to be sold to customers in the United States.
- 8. Provide the address of each warehouse and the address, name, and relationship to ContextLogic of the operator of each of the warehouses (e.g. the "FBW-US-LAX" and "FBW-US-ORD" warehouses) supporting "fulfillment by Wish" (FBW) or other distribution of products offered on Wish or with the assistance of ContextLogic for sale in the United States.
- 9. State whether, and if so how, a Merchant Seller in China can import a product without using the FBW warehouse when importing products offered on Wish or with the assistance of ContextLogic for sale in the United States.
- 10. Please list all "apps" and logistical or other products (e.g. WishPost, Paypal) that Wish suggests or requires its merchant sellers to use that apply to merchant sellers importing to and/or selling product in the United States with the assistance of ContextLogic and/or via the Wish platform. For each app or logistical or other products:
  - a. Identify if owned or controlled in whole or part by ContextLogic or an affiliated company.
  - b. If not owned or controlled in whole or part by ContextLogic or an affiliated company, describe the relationship to ContextLogic and the Wish platform.
  - c. If required in certain contexts, state the context (for example, WeChat seems to be identified on the Wish website as required for Merchant Sellers in China).
  - d. Identify if it facilitates:
    - i. Describing on the Wish platform a product offered for sale in the United States,
    - ii. Tracking stats and data analytics related to product sales,
    - iii. tracking orders,
    - iv. tracking shipments,
    - v. fulfilling orders,
    - vi. import into the United States,
    - vii. tracking or facilitating clearing customs in the United States,
    - viii. tracking or facilitating compliance with environmental laws such as the Clean Air
    - ix. tracking payment received from customers,
    - x. tracking payments sent to merchant sellers, or
    - xi. Hold and release of funds in accordance with Wish/ContextLogic's policies.
- 11. Provide any other relevant information regarding compliance with the CAA for each product identified in response to Request 1.
- 12. Identify each person responsible for responding to this Information Request, including his or her title, and the Request(s) to which he or she responded.

#### Appendix D

#### Confidential Business Information

An entity may assert a business confidentiality claim covering all or part of the information provided in response to this Information Request for any business information entitled to confidential treatment under Section 208(c) of the CAA, 42 U.S.C. § 7542, and 40 C.F.R. Part 2, subpart B. Under Section 208(c) of the CAA, entities are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 208(c) of the CAA and 40 C.F.R. Part 2, subpart B. EPA will construe a failure to furnish a business confidentiality claim with a response to this Information Request as a waiver of that claim, and the information may be made available to the public without further notice.

Pursuant to 40 C.F.R. § 2.301(h), the EPA possesses the authority to disclose to any authorized representative of the United States information which might otherwise be entitled to confidential treatment. To assist in its review and analysis, the EPA may disclose information provided in response to this and other information requests to an EPA contractor, the Eastern Research Group, under contract number 68HERH19C0004. See 84 Fed. Reg. 8859, 59-60 (Mar. 12, 2019). An entity may submit any comments to the EPA with its assertion of a business confidentiality claim.

To assert a business confidentiality claim, an entity must place on (or attach to) all information subject to the claim either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time it provides its response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be provided separately to facilitate identification and handling by the EPA. An entity should indicate whether confidential treatment is only required until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material claimed as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that an entity must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e), (2) that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without its consent, and (4) the disclosure of the information is likely to cause substantial harm to its business's competitive edge. See 40 C.F.R. §§ 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7542(c); 40 C.F.R. § 2.301(e).

If an entity asserts a claim of business confidentiality in connection with information and documents forwarded in response to this Information Request, in accordance with 40 C.F.R. § 2.204(e)(4), it must

answer the following questions with respect to any information or document for which it asserts a claim of business confidentiality:

- 1. What specific portions of the information are allegedly to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to the claim.
- 2. For what period of time do you request that the information be maintained as confidential (e.g., until a certain date, until the occurrence of a specified event or permanently)? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
- 3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
- 4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- 5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
- 6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of that harm, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effect. How could your competitors make use of this information to your detriment?
- 7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding requests? If so, you may provide such additional explanation.

An entity must furnish responses to the above questions concurrent with its response to this Information Request if it has claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), an entity may request an extension of this deadline. The EPA will construe a failure to furnish timely responses to the above questions as a waiver of any confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1).

Pursuant to 40 C.F.R. § 2.205(c), be hereby advised that information provided as part of any comments may be entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), an entity may assert a business confidentiality claim covering all or part of its response to these Requests, as provided in 40 C.F.R. § 2.203(b). Information covered by such a business confidentiality claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 208(c) of the CAA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with the comments as a waiver of that claim, and the information may be made available to the public without further notice.

## Appendix E

### **Statement of Certification**

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Information Request, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

compliance with the C	lean Air Act and its affiliated re	gulations.	,
I certify that I am fully provide the above info	y authorized byormation on its behalf to EPA.		_[corporate affiliation] to
documents, including a responsibility for obtain of my knowledge and knowingly submitting	of law that I have examined and all attachments. Based on my indining the information, I certify the belief, true and complete. I am a false statements and information to Section 113(c)(2) of the Cle	quiry of those indivi- nat the statements and ware that there are so and, including the possi-	iduals with primary and information are, to the best significant penalties for sibility of fines or
Date:			
Name (Printed):			
Signature:			
Title:			